

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

ANTHONY MARTIN,

Plaintiff,

vs.

THE CINCINNATI INSURANCE CO.

Defendant.

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Case No.: 4:17-CV-00142

CERTIFICATION OF ATTEMPT TO RESOLVE

Counsel for Plaintiff in this action, Kevin A. Sullivan, provides his statement of attempt to resolve Plaintiff's discovery dispute with Defendant, pursuant to Local Rule 37-3.04. Plaintiff served a Request for Production of Documents and First Interrogatories on Defendant. Defendant has asserted objections to most of the discovery requests and has failed to produce the requested documents. Plaintiff has requested that Defendant withdraw its objections to certain of the discovery requests and produce all responsive documents. The undersigned counsel for Plaintiff discussed the objections with counsel for Defendant, Jennine Adamek, on September 28, 2017 at the offices of Brown & James. A phone conference was held on October 31, 2017 between counsel at which the discovery requests and objections were again discussed. Despite these good faith efforts to resolve the discovery dispute, counsel has been able to do so.



SAUTER SULLIVAN, LLC

By: /s/ Kevin A. Sullivan

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